

Paige Hammer WSB #7-5882
Assistant United States Attorneys
District of Wyoming
P.O. Box 668
Cheyenne, WY 82003
(307) 772-2124
paige.hammer@usdoj.gov

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Docket No. 23-CR-161-J

ADAM SHANE AVILES, JR,

Defendant.

GOVERNMENT’S NOTICE OF INTENT TO OFFER EXPERT TESTIMONY

The United States of America hereby submits its notice of intent to offer expert testimony. Fed. R. Crim. P. 16(a)(1)(G). The United States reserves the right to further supplement this notice.

SPECIAL AGENT MATTHEW WRIGHT, BUREAU OF ALCOHOL TOBACCO & FIREARMS

Qualifications: Matthew Wright is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) stationed in Cheyenne, Wyoming. SA Wright’s training and experience in this area are set forth in his Statement of Qualifications, attached hereto as **Exhibit 1**. Within the past four years, SA Wright has authored no publications and has testified as an expert in one jury trial. *United States of America v. Roland French*, 22-CR-00054-ABJ (D. Wyo. 2022). Fed. R. Crim. P. 16(a)(1)(G)(iii).

Summary of Testimony: SA Wright is expected to testify as to his extensive training and experience regarding the identification, origin, and classification of firearms under federal firearms

law, to include issues relating to the interstate nexus of firearms. SA Wright would testify as to the identification, location of manufacture, and the subsequent transportation of the firearm at issue in the instant offense, including but not limited to the fact the firearm in this case was not manufactured in Wyoming and was therefore transported from another state into Wyoming. More specifically, consistent with his written report, SA Wright is expected to testify that the Fiocchi, 45 ACP caliber ammunition was manufactured in Italy by Fiocchi. SA Wright's report has been previously provided in discovery and summarizes that the ammunition at issue in this matter was in and affecting interstate commerce.

The United States asserts that this notice and the report previously provided to the Defendant satisfies the requirements of Rule 16(a)(1)(G). If, after viewing this notice and the attachments, the Defendant requests further information or has concerns under Rule 16, the United States requests the Defendant advise as to what further information is necessary to prepare for trial.

Respectfully submitted this 6th day of December, 2023.

NICHOLAS VASSALLO
United States Attorney

By: /s/ Paige Hammer
PAIGE HAMMER
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2023, the foregoing was filed via CM/ECF and
thereby served upon counsel for the Defendant.

/s/ Janee Woodson
UNITED STATES ATTORNEY'S OFFICE